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Attorneys for Defendants
 SLM CORPORATION and SALLIE MAE, INC.

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

ANDREW BRADSHAW, TANIF) Case No. CV-12-6376-JSW
 STEPHENSON, ADAM CORRIVEAU, and)
 JESELL GONZALEZ, on behalf of themselves) [Assigned to the Hon. Jeffrey S. White]
 and similarly situated individuals,)

Plaintiff,

v.

SLM CORPORATION, a Delaware
 corporation; and SALLIE MAE, INC., a
 Delaware corporation,

Defendants.

**STIPULATION AND ~~PROPOSED~~
 ORDER TO EXTEND TIME TO
 RESPOND TO PLAINTIFFS'
 COMPLAINT AND CONTINUE THE
 INITIAL CASE MANAGEMENT
 CONFERENCE**

Action Filed: December 17, 2012

[Local Rule 6-1(b)]

[Declaration of Lisa M. Simonetti filed
 concurrently]

WHEREAS, plaintiffs Andrew Bradshaw, Tanif Stephenson, Adam Corriveau and Jesell Gonzalez ("Plaintiffs") filed their Class Action Complaint for Equitable, Declaratory and Injunctive Relief and Damages For (1) Aiding and Abetting Fraud, (2) Mistake of Fact, (3) Unjust Enrichment, (4) Violations of the California Unfair Competition Law, and (5) Violations of the Oklahoma Consumer Protection Act ("Complaint") on December 17, 2012;

WHEREAS, on or about January 16, 2013, the Complaint was served on defendants SLM Corporation and Sallie Mae, Inc. (“Defendants”);

WHEREAS, Plaintiffs filed their First Amended Class Action Complaint (“FAC”) on February 4, 2013;

WHEREAS, on or about February 4, 2013, counsel for Defendants agreed to accept service of the FAC on behalf of Defendants;

WHEREAS, Defendants’ response to the FAC is due on February 25, 2013;

WHEREAS, Plaintiffs have agreed to grant Defendants an extension of time to respond to the FAC up to and including March 22, 2013;

WHEREAS, the Court has set the initial Case Management Conference for March 22, 2013 at 1:30 p.m. (Dkt. No. 8), which is the same date that that Defendants’ response will be due in accordance with the parties’ agreement;

WHEREAS, pursuant to Civil Local Rules 6-1(b) and 6-2, the parties may request an order changing a deadline that would extend deadlines set forth in the Local Rules or Federal Rules; and

WHEREAS, this Stipulation is made in good faith and not for purposes of delay.

[Stipulation Continued On Next Page]

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IT IS HEREBY STIPULATED by and between the parties, through their respective counsel of record, as follows:

(a) The date by which Defendants must respond to Plaintiffs' FAC is continued from February 25, 2013 to March 22, 2013;

(b) The date of the initial Case Management Conference is continued from March 22, 2013 to April 19, 2013 at 1:30 p.m.

Dated: February 6, 2013

STROOCK & STROOCK & LAVAN LLP
JULIA B. STRICKLAND
LISA M. SIMONETTI
KRISTINA A. DEL VECCHIO

By: /s/ Lisa M. Simonetti

Lisa M. Simonetti

Attorneys for Defendants
SLM CORPORATION and SALLIE MAE, INC.

Dated: February 6, 2013

WOLF LEGAL, P.C.
ADAM B. WOLF
TRACEY DEMMON BERGER

By: /s/ Adam B. Wolf


Adam B. Wolf

Attorneys for Plaintiffs
ANDREW BRADSHAW, TANIF
STEPHENSON, ADAM CORRIVEAU,
and JESELL GONZALEZ

PROPOSED ORDER

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

Dated: February 6, 2013


The Honorable Jeffrey S. White